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9           *Attorneys for Plaintiff*

10           **UNITED STATES DISTRICT COURT**  
11           **CENTRAL DISTRICT OF CALIFORNIA**

12           URSULA BYRAM, S.B. by and  
through guardian *ad litem* TIMOTHY  
13           BYRAM, N.B. by and through  
guardian *ad litem* TIMOTHY  
14           BYRAM, and A.B. by and through  
guardian *ad litem* KAITLYN  
15           HUMENCHUK, individually and as  
successors-in-interest to Everett  
16           Byram,

17           Plaintiffs,

18           v.

19           COUNTY OF LOS ANGELES,  
BLAKE RUNGE, and DOES 1-10,  
21           inclusive,

22           Defendants.

Case No.: 2:23-cv-9285-SB (MARx)

23           **SUPPLEMENTAL JOINT RULE 26(f)  
REPORT**

Judge: Hon. Stanley Blumenfeld

Date: Jan 19, 2024

Time: 8:30 AM

Location: Courtroom 6C

350 West First Street,  
Los Angeles, CA 90012

Original Complaint: Nov 3, 2023

County Answer: Dec 6, 2023

Blake Runge Answer: Dec 19, 2023

Trial (Proposed): October 29,  
2024

MSC: Jan 19, 2024

1                   **SUPPLEMENTAL JOINT RULE 26(f) REPORT**

2                   The parties hereby submit their Supplemental Joint Rule 26(f) Report  
3 pursuant to the Court's Minutes (Dkt. 31).

4                   Pursuant to *Federal Rule of Civil Procedure* Rule 26(f), the parties have met  
5 and conferred electronically and provide the following updates to the Court's  
6 Order:

7                   **I.        Judicial Magistrate**

8                   On January 30, 2024, Defendants proposed three (3) options for a magistrate  
9 judge: Douglas McCormick, Shashi H. Kewalramani, and Maria Audero. These  
10 options were rejected Plaintiffs' counsel.

11                  On February 1, 2024, Plaintiffs then proposed two (2) options for magistrate  
12 judges: Pedro Castillo and Margo Rocconi.

13                  Defendants has likewise rejected Plaintiffs' proposed magistrate judges.  
14 Defendants will provide additional proposed magistrate judges shortly. The parties  
15 continue to work together to agree upon a suitable magistrate judge.

16                  **II.      Cell Phone and Laptop**

17                  On February 16, 2023, Judge Connie Quinones issued a search warrant for  
18 the laptop and cell phone of Everett Byram and their contents. Defendants report  
19 that these two (2) devices are currently part of an ongoing police investigation  
20 regarding the February 10, 2023 incident.

21                  Both the cellphone and laptop are password protected. Plaintiff Ursula

1 Byram refused to provide investigators with a password/access code to the devices.  
2 Defendants report that investigators have been using an electronic program that  
3 inputs hundreds of thousands of passwords until the correct password is generated  
4 in order to access the contents of the devices. This process of generating a password  
5 necessarily takes a considerable amount of time to gain access to the devices. As  
6 of today's date, the investigators have not gained access to the devices and,  
7 therefore, the investigators cannot simply transfer the data contained on the devices  
8 because they have yet to gain access to them. Defendants have made the  
9 investigators aware of the need to return the devices and they continue to work to  
10 gain access so they can then transfer the data and return the devices to Plaintiffs.

14 Defendants asked if Plaintiffs would provide the passwords to the devices  
15 so that investigators could instantly gain access to the devices and then could make  
16 a copy of the contents of the devices and return them. Plaintiffs have declined to  
17 provide the passwords, citing a lack of valid reason from the County for accessing  
18 the information on the devices. Further, Plaintiffs believe that this request infringes  
19 on their privacy rights.

22 Defendants are currently making efforts to contact the lead investigator in  
23 order to provide Plaintiffs with as many details as possible on the progress of  
24 gaining access to both the laptop and cell phone.

26 Plaintiffs have informed Defendants that if the devices are not returned by  
27 February 9, 2024, they will seek an order from this Court compelling their return.  
28

1 Defendants continue to work to accommodate this request by Plaintiffs  
2 stated deadline.

3       **III. Supplemental Initial Disclosures**

4       A Protective Order has been agreed upon, signed and filed with the Court.  
5 Defendants have provided Plaintiffs with Supplemental Initial Disclosures and all  
6 documents identified in Defendants' Supplemental Initial Disclosures as of  
7 February 2, 2024.

8       DATED: February 2, 2024                   LAW OFFICES OF DALE K. GALIPO

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11  
12  
13       By:        */s/Cooper Alison-Mayne*  
14                   Dale K. Galipo  
15                   Cooper Alison-Mayne  
16                   *Attorneys for Plaintiffs*

17       DATED: February 2, 2024                   HURRELL CANTRALL LLP

18  
19  
20       By:        */s/Jordan S. Stern*  
21                   THOMAS C. HURRELL  
22                   NICOLE G. ORTEGA  
23                   JORDAN S. STERN  
24                   *Attorneys for Defendants COUNTY OF  
25                   LOS ANGELES and DEPUTY BLAKE  
26                   RUNGE*